

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO.: 05 10596 NMG

THOMAS KELLEY,
Plaintiff,

VS.

TOWN OF PLYMOUTH and
ROBERT J. POMEROY, as Chief of the
Plymouth Police Department and
Individually,
Defendants.

**ASSENTED TO MOTION TO EXTEND TIME TO RESPOND TO IG'S
MOTION TO QUASH**

Now comes the defendants in the above-captioned matter, and respectfully request this Honorable Court to allow an extension of the time (3 weeks) in which they can file a response to the Inspector General's (hereinafter "IG") Motion to Quash Deposition Subpoena *Duces Tecum* (Document 62).

As reasons for this motion, counsel for the defendants state they require the additional time (3 weeks from the original response due date of July 16, 2007) to respond to the motion just filed on June 14, 2007. First, the privilege log that was to be attached to said motion (Document 62) has not been produced, as yet. Defendants have assented to a request for additional time for the IG to produce same. Defendants' counsel would like to an opportunity to review said privilege log prior to their full response. Second, Defendants' counsel will be out of town and unavailable for a week during this time period. Third, there will be no prejudice to any party as the discovery deadlines have been extended. (See

Court Order of May 29, 2007). Further, the Inspector General's office (represented by the Attorney General) assents to this request.

Therefore, the defendants respectfully request that this Court allow the extension until July 16, 2007.

Assented To,
OFFICE OF THE
INSPECTOR GENERAL,
By its attorney,

Respectfully submitted,
DEFENDANTS,
ROBERT J. POMEROY and the
TOWN OF PLYMOUTH,
By their attorneys,

/s/ Christine A. Baily
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Dated: 6.19.07